

Robert B. Zelms, Arizona Bar No. 018956
rbz@manningllp.com

Nishan J. Wilde, Arizona Bar No. 031447
njw@manningllp.com

**MANNING & KASS
 ELLROD, RAMIREZ, TRESTER LLP**
 3636 North Central Avenue, 11th Floor
 Phoenix, Arizona 85012
 Telephone: (602) 313-5469

*Attorneys for Defendants Grand Canyon University;
 Grand Canyon Education, Inc.; Grand Canyon University
 Campus Police; and Brian Mueller*

**UNITED STATES DISTRICT COURT
 DISTRICT OF ARIZONA**

Kino Bonelli,

Plaintiff,

v.

Grand Canyon University; Grand Canyon
 Education, Inc.; Grand Canyon University
 Campus Police and Public Safety; Brian
 Mueller; Joe Yahner; Kenny Byers;
 Michael Martinez; Officer Robinson;
 Officer Washington; Sergeant Bristle;
 Sergeant Wiley; Officer M. Grupe; And
 Steve Young, Individually, and in their
 capacity as officers and agents for Grand
 Canyon University and Grand Canyon
 University, Inc.,

Defendants.

Case No. 2:20-cv-00143-SMB

**NOTICE OF NON-PARTIES AT
 FAULT**

(Assigned to Honorable Susan M.
 Brnovich)

Defendants Grand Canyon University; Grand Canyon Education, Inc.; Grand Canyon
 University Campus Police; and Brian Mueller (collectively “GCU Defendants”) by and
 through undersigned counsel, hereby file this notice of non-party at fault.

GCU Defendants make this disclosure pursuant to *Rosner v. Denim & Diamonds*, 188
 Ariz. 431, 937 P.2d 353 (App. 1996). To the extent that ongoing discovery uncovers the fault
 of a non-party in this matter, GCU Defendants reserve the right to amend this notice and name
 non-parties at fault.

1. Unidentified Persons or Entities

1 Plaintiff claims that he has suffered emotional and physical stress due to the alleged
 2 actions of GCU. To the extent that discovery uncovers other persons or entities who caused or
 3 contributed to Plaintiff's emotional and physical distress, that person or entity is a non-party at
 4 fault.

5 Plaintiff also claims that due to GCU's actions, his grades suffered and he could not
 6 obtain meaningful employment after graduation. To the extent that discovery uncovers other
 7 persons or entities who had a negative impact on Plaintiff's grades or employment, that person
 8 or entity is a non-party at fault.

9 Plaintiff also claims that he incurred a loss of reputation, shame, embarrassment,
 10 humiliation, mental anguish, and lost wages. To the extent that discovery uncovers other
 11 persons or entities who had caused or contributed to these damages, that person or entity is a
 12 non-party at fault.

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 14 DATED: September 8, 2020

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP

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 16 By: s/ Nishan J. Wilde

17 Robert B. Zelms

18 Nishan J. Wilde

19 *Attorneys for Defendants Grand Canyon*
 20 *University; Grand Canyon Education, Inc.;*
 21 *Grand Canyon University Campus Police; and*
 22 *Brian Mueller*
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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of September, 2020, I electronically filed the foregoing, using the CM/ECF system, which served the following CM/ECF participants:

Krista R. Hemming
THE HEMMING FIRM
222 West 6th Street, Suite 400
San Pedro, CA 90731
thehemmingfirm@gmail.com
(Pro Hac Vice Approved 12/4/2019)
Attorney for Plaintiff

s/ Diana Drake